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March 22, 2022

VIA ECF

Honorable Brian M. Cogan
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Al Malik Alshahhi, et. al., No. 1:21-cr-00371 (BMC)

Dear Judge Cogan:

On behalf of defendant Matthew Grimes in the above-captioned case, we respectfully write to inform the Court that Mr. Grimes joins in Sections I, II, and IV of the March 21, 2022 motion to compel discovery filed by defendant Thomas J. Barrack, Jr. seeking the production of specific discovery from the government pursuant to Federal Rule of Criminal Procedure 16 and *Brady v. Maryland*, 373 U.S. 83 (1963). Mr. Grimes hereby incorporates the Motion (Dkt. 89), Sections I, II, and IV of the Memorandum in Support of the Motion (Dkt. 89-1), and Exhibit A attached thereto (Dkt. 89-2).

For purposes of Mr. Grimes' joinder, Mr. Barrack's position seeking the production of all exculpatory material related to the Section 951 charges from the government (Sections I & II, Memorandum in Support of the Motion) and the request for a completion of production from the prosecution team and federal executive agencies (Section IV, Memorandum in Support of the Motion) mirrors Mr. Grimes' position, such that the points and authorities detailed in those sections of the Memorandum should be deemed to apply to Mr. Grimes and the relief requested as to those materials considered to be requested by Mr. Grimes as well. Mr. Grimes joins in part in the Motion to avoid burdening the Court with duplicative papers, and he requests that the Court grant the relief requested.

Respectfully,

/s/ Abbe David Lowell
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cc: All counsel of record (via ECF)